

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Greenbelt Division)**

In re)	
)	
Trudah A. Harding)	
)	No. 25-11103-MCR
Debtor.)	Chapter 13
)	

MOTION TO SHORTEN TIME AND/OR REQUEST FOR EXPEDITED HEARING

The Movant requests that the Court shorten the time to object to the motion or other paper identified herein in accordance with Local Bankruptcy Rule 9013-7 and for the reasons explained below. If a timely objection is filed or the Court otherwise finds a hearing necessary, the Movant requests that the Court set a hearing on the motion or other paper on the date requested below or as soon as reasonably practicable.

Title of Motion or Other Paper: MOTION FOR ORDER APPROVING CONTRACT TO SELL REAL ESTATE AND AUTHORIZING SALE OF REAL PROPERTY; AND TO PAY REAL ESTATE AGENT

Requested Objection Deadline: September 12, 2025

Requested Hearing Date: September 15, 2025 (by zoom)

Reasons for Request: Contractual requirement to close by September 15. Debtors attempted to have buyers extend the deadline, but their rate lock would expire.

Parties affected by the relief requested in the Motion or Other Paper: All filed claims, but particularly Charity at its Best (represented by Benjamin Smith, served by CM/ECF).

X I hereby certify that the reduction of the time period is not prohibited under Fed. R. Bankr. P 9006(c)(1).

Respectfully submitted,

/s/ Daniel M. Press

Daniel M. Press, #07300
Chung & Press, P.C.
6718 Whittier Ave., Suite 200
McLean, VA 22101
(703) 734-3800
(703) 734-0590 fax
dpress@chung-press.com

CERTIFICATE OF SERVICE

This is to certify that on this 10th day of September, 2025, I caused the foregoing document to be served on upon the Chapter 13 Trustee, and all parties requesting notice by CM/ECF, to:

Seth W Diamond sdiamond@shulmanrogers.com,
w.sr69548@notify.bestcase.com

Rebecca A. Herr ecf@ch13md.com

Benjamin Smith bsmith@shulmanrogers.com,
vdeguzman@shulmanrogers.com,
MZawalick@shulmanrogers.com,
tlong@shulmanrogers.com,
cwarren@shulmanrogers.com

And by email upon all other parties who have filed proofs of claim, as follows:

By email:

Jefferson Capital Systems, bankruptcy@jcap.com

Pepco: pepcocredit@exeloncorp.com

MD Comptroller: mthomas@marylandtaxes.gov

WSSC: Heather.Ashbury@wsscwater.com

US Trustee: Jeanette.Rice@usdoj.gov, USTPRegion04.GB.ECF@USDOJ.GOV

/s/ Daniel M. Press